

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

|                            |   |                          |
|----------------------------|---|--------------------------|
| _____                      | ) |                          |
| TAYLOR ENERGY COMPANY LLC, | ) |                          |
|                            | ) |                          |
| Plaintiff,                 | ) | No. 16-12C               |
|                            | ) | Judge Nancy B. Firestone |
| v.                         | ) |                          |
|                            | ) |                          |
| THE UNITED STATES,         | ) |                          |
|                            | ) |                          |
| Defendant.                 | ) |                          |
| _____                      | ) |                          |

DECLARATION OF CAPTAIN KRISTI M. LUTTRELL, USCG

I, Kristi M. Luttrell, do hereby state and declare as follows:

1. I have been a commissioned officer in the United States Coast Guard for 25 years and currently hold the rank of Captain (O-6). Since June 15, 2018, I am serving as the Captain of the Port and the Commander for Coast Guard Sector New Orleans. This also means that pursuant to the National Contingency Plan, 40 C.F.R. Part 300, I am the designated Federal On-Scene Coordinator (FOSC) for oil response operations within the geographic area covered by Sector New Orleans. This includes serving as the FOSC for the oil spill incident known as the MC-20 Taylor Energy Response.
2. As the FOSC for the MC-20 Taylor Energy Response, I am a member of the Unified Command for the incident. The other member of the Unified Command is Mr. Will Pecue serving on behalf of the Taylor Energy Company, the Responsible Party for the incident as defined by 33 U.S.C. § 2701(32). The Unified Command is responsible for overall management of an incident. The Unified Command

directs incident activities including the development and implementation of incident objectives, strategies, and approves ordering and releasing of resources.

3. Since I assumed the position of FOSC for the MC-20 Taylor Energy Response, the Unified Command has met once, from August 14th through August 16th, 2018. During the meeting, the Unified Command agreed to use a 3-month/quarterly operational period with the first operational period ending on September 30, 2018, to align with the end of the fiscal quarter. The Unified Command also created an Incident Action Plan for the operational period. The Unified Command will meet again in September 2018 to create a new Incident Action Plan. After that, the Unified Command will meet at least quarterly to assess progress, review strategies, and create a new Incident Action Plan.

4. Exhibit A to this declaration is the Incident Action Plan (IAP). The IAP has seven objectives including monitoring the site for recoverable oil, responding to recoverable oil, and to “secure the source of the ongoing sheen – elimination of the sheen within 12 months.” Exhibit A at 4. During the current operational period, the Unified Command’s emphasis is to:

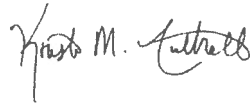
- a. Observe the source,
- b. Follow-up or respond to dark oil, and
- c. Assess and plan for dredging/haul away of contaminated sediment.

*Id.* The Unified Command considered other strategies identified on form ICS-234 as alternative options to secure the source of the ongoing sheen and those additional strategies remain possible options in the future. The ICS-234 is Exhibit B to this declaration. Included among those options are an intervention option

and a plugging option. If dredging and hauling away contaminated sediment is determined to not be a viable response strategy or does not eliminate the sheen at the MC-20 site, the Unified Command will pursue alternative strategies until the objective of eliminating the sheen is achieved.

5. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the forgoing is true and correct to the best of my knowledge and belief.

Executed on this 6<sup>th</sup> day of September, 2018.



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Kristi Luttrell  
Captain of the Port and Commander  
Coast Guard Sector New Orleans

|   |   |  |
|---|---|--|
| <b>1. Incident Name</b><br>MC-20 - Taylor Energy Response   | <b>2. Operational Period to be covered by IAP (Date/Time)</b><br>From: 17AUG18      To: 30SEP18 | <b>CG IAP<br/>COVER SHEET</b>  |
| <b>3. Approved by Incident Commander(s):</b>  |   |  |
| <b>ORG</b><br>FOSC<br>RP/TEC<br><br><br><br>  | <b>NAME</b><br>CAPT Kristi Luttrell<br>Mr. William Pecus<br><br><br><br>                        | <i>Kristi Luttrell, CAPT, USCG</i><br>Verbally approved the plan as briefed on<br>16 August 2018. Took written plan<br>under legal advisement. MDA PSC<br>16 August 2018 |
| <h2 style="margin: 0;">INCIDENT ACTION PLAN</h2> <p style="margin: 5px 0;">The items checked below are included in this Incident Action Plan:</p> <div style="margin-top: 10px;"> <input checked="" type="checkbox"/> ICS 202-CG (Response Objectives) _____<br/> <input checked="" type="checkbox"/> ICS 203-CG (Organization List) – OR – ICS 207-CG (Organization Chart) _____<br/> <input checked="" type="checkbox"/> ICS 204-CGs (Assignment Lists)<br/>             One Copy each of any ICS 204-CG attachments: _____<br/> <br/> <input type="checkbox"/> ICS 205-CG (Communications Plan) _____<br/> <br/> <input checked="" type="checkbox"/> ICS 206-CG (Medical Plan) _____<br/> <input type="checkbox"/> ICS 208-CG (Site Safety Plan) or Note SSP Location _____<br/> <input type="checkbox"/> Map/Chart _____<br/> <input type="checkbox"/> Weather forecast / Tides/Currents _____<br/> <b>Other Attachments</b><br/> <input checked="" type="checkbox"/> ICS 202A-CG Command Direction _____<br/> <input checked="" type="checkbox"/> ICS 202B-CG Critical Information Requirements _____<br/> <input type="checkbox"/> _____<br/> <input type="checkbox"/> _____<br/> <input type="checkbox"/> _____<br/> <input type="checkbox"/> _____<br/> <input type="checkbox"/> _____<br/> <input type="checkbox"/> _____<br/> <input type="checkbox"/> _____<br/> <input type="checkbox"/> _____<br/> <input type="checkbox"/> _____         </div> |   |  |
| <b>4. Prepared by:</b><br>LCDR Mike Anderson, PSC   |   | <b>Date/Time</b><br>08/16/2018 1100  |

|   |  |  |
|---|--|--|
| <b>1. Incident Name:</b><br><b>MC-20 Taylor Energy Response</b> | <b>2. Operational Period (Date/Time)</b><br><b>From: 17AUG18 To: 30SEP18</b> | <b>Command Direction</b><br><b>ICS 202A-CG</b> |
|---|--|--|

**3. Key Decisions and Procedures: (Ref IMH pg 4-1 to 4-2)**

**NAME OF INCIDENT:** MC-20 Taylor Energy Response

**OPERATIONAL PERIOD:** Unified Command will utilize a 3-month/quarterly operational period. The first period is truncated to align with the end of the fiscal quarter.

**FUNCTIONS:** Oil Spill Response/Sheen Source Control

**RESPONSIBLE PARTY (RP) ( RP defined in Title 33 USC 2701(32)):** TAYLOR ENERGY COMPANY (TEC)

**UNIFIED COMMAND ORGANIZATIONS:** USCG (FOSC), TEC (RP)

**ASSISTING & COOPERATING AGENCIES:** BSEE, NOAA, BOEM

**ORGANIZATION:** (Consider Shift Work)

- **AGENCY EXECUTIVE(S):** CG5RI, USCG D8,
- **INCIDENT/UNIFIED COMMAND:** USCG – CAPT Kristi Luttrell, TEC – Mr. Will Pecue
- **COMMAND STAFF/GENERAL STAFF (consider assistants):** UC will make time-phased decisions about which Incident Management Team (IMT) positions will be staffed physically or virtually. See ICS 207 for notional positions.

**PREVIOUS NOTICES & ORDERS:** All previous FOSC notices and orders remain in effect until canceled or amended by the FOSC.

**AUTHORITY & JURISDICTION:** Agencies participating in the Unified Command do not give up their authority or jurisdiction.

**USCG -** The National Contingency Plan (NCP) contained in Title 40 CFR Part 300 designates the USCG as the Federal On-Scene Coordinator (FOSC) for oil spills in the Coastal Zone. The NCP also specifies the FOSC's authority to effect response actions to protect people, property and the environment. The ongoing oil spill emanating from the RP's MC-20 site is occurring in waters contained within the scope of the NCP. The Coast Guard FOSC for the impacted area is the Captain of the Port and Sector Commander located in New Orleans, LA. The FOSC has access to the Oil Spill Liability Trust Fund to respond to the ongoing spill.

**BSEE -** BSEE executes its authorities under the Outer Continental Shelf Lands Act (OCSLA) and the Oil Pollution Act (OPA) to assist the FOSC by overseeing and, when necessary, directing measures to abate sources of pollution from regulated offshore facilities to ensure minimal release of oil, and to prevent unwarranted shutdown of unaffected production and pipeline systems. In addition, under the provisions outlined in Title 40 CFR Part 300.170, BSEE has identified certain ICS source control positions that it could fill within in an IMT during oil spills. Additional details on the BSEE-USCG relationship during oil pollution response can be found in BSEE/USCG MOA: OCS-03: Oil Discharge Planning. The ongoing spill from the MC-20 TEC site falls within the boundaries of the BSEE Gulf of Mexico Region Boundaries.

**UC MEETING REPRESENTATION:**

- Each UC principle member will be allowed one additional technical representative (no lawyers).
- Legal counsel shall only be permitted to attend meetings IAW with ICS-230 meeting schedule.
- All meeting attendees shall abide by UC adopted meeting ground rules.

**UC DECISION DOCUMENTATION:** All binding decisions will be documented via a decision memo signed by the Unified Commanders.

**UC FACILITIES:** UC facilities will be established according to the needs of the response. UC meetings will be held at alternating sites. One staging area is currently being used to store containment domes in Amelia at Danos. Overflights are currently conducted out of Southern Seaplane in Harvey, LA.

**IMT PROCEDURES FUNCTION:** IMT will be comprised of USCG, BSEE, TEC, and NOAA personnel. The USCG Incident Management Handbook (IMH) and BSEE Source Control Position Job Aids, found at the following web site: <https://www.bsee.gov/what-we-do/oil-spill-preparedness/incident-response>, will be used by all UC personnel in the execution of their job responsibilities within the IMT. All IMT personnel shall promptly respond to phone calls/emails/notes from other IMT members.

- UC meeting agenda is distributed by USCG no later than 2 weeks in advance of UC meeting. Should Taylor have edits, it will respond within 2 business days (repeated as needed, with the objective to having the final agenda established no later than one week prior to the UC meeting).
- UC agenda items are listed in the order of: old business, new business, recap of new action items, and scheduling for next meetings.
- Transparency of the UC activities/decisions/action items is critical to protecting and maintaining the integrity of the process.
- Breaks are permitted as needed to allow attorney/client discussion. IC's shall have complete discretion to ask for this break in all meetings at any time.
- Non-participating and participating attendees to the UC meetings and other related meetings are determined by and at the discretion of the UC. If there is a room capacity limit for the meeting venue, the UC will determine the audience.
- Everyone comes fully prepared and informed for the agenda item discussion.

- g. All decisions and action items agreed to by the IC's must be fair, productive, and practical.
- h. The approximately fourteen-year record of the MC20 response may inform and be used to support response decisions and agreed action items. Decisions going forward are not to be made "in a vacuum"
- i. Appropriate (Fully disclosed and reviewed/verified by the other party) science and facts that comprise the UC response record may inform all decisions and action items agreed to by the IC's.
- j. Action items are reviewed at the end of the meeting with target dates set for closure.
- k. If any party (Govt/TEC) knows it will not meet an action item deadline, it will promptly communicate to the other party with an option of (receiving party) postponing further UC engagement until the task has been completed.
- l. For media inquiries a joint statement will be prepared for review/approval 24 hours before the media deadline. Should joint approval not occur within the timeline independent statements may be issued. All attempts shall be made to achieve a joint statement.
- m. UC requests approval of any ICS-213RR over \$10,000.

**UC FUNCTIONALITY:** IMT will adhere to USCG Planning "P". IAPs will be routed to UC for approval and signature. Supporting and Operational Plans will be routed to UC for approval and signature.

Unified Command (UC) meetings are to be set four weeks in advance. USCG forwards proposed date to Taylor's IC (cc to Denise Mustin) with Taylor to respond within 2 business days. Should Taylor have to propose an alternate date, USCG will respond within 2 business days (repeated as needed). Whenever possible, the meetings will be scheduled to accommodate the IC's other commitments.

#### 4. Priorities: (Reference IMH pg 4-2 to 4-3)

Safety

Incident Stabilization

Environmental Protection

Information Management/Situational Awareness

#### 5. Limitations and Constraints: (Ref IMH pg 4-3 to 4-4)

**FINANCIAL:** This is a Responsible Party funded response. The Oil Spill Liability Trust Fund (OSLTF) is available to fund response actions as needed. OSLTF may be used to fund federal, state, or tribal agency travel and actions in support of this response. The USCG will seek reimbursement of the OSLTF from the RP for these expenses. The OSLTF may also be used to fund resources that the FOSC determines are necessary for securing the source of the spill.

**LOGISTICAL:** The remote location of the MC-20 response site requires that resource mobilization, operations, and logistics need to be carefully planned.

**OPERATIONAL/SAFETY/ENVIRONMENTAL:** Safety is of the utmost importance while conducting response ops offshore. Some operations may require deploying personnel subsurface. The water depth at the site is 420'; subsurface visibility is poor. A large erosion pit has evolved beneath portions of the Jacket structure. There are plumes emanating from the ocean floor at the erosion pit.

**RESOURCES:** Traditional well intervention equipment may be limited in its application due to seafloor conditions as described below. Non-traditional approaches may be required.

**GEOGRAPHY/TERRAIN:** The seafloor at the MC-20 response site is characterized as porous, unconsolidated sediments. The fallen Jacket structure remains within the MC-20 lease which presents potential hazard to certain operations. Hazards will need to be assessed during each phase of operation. A large erosion pit has been identified in the vicinity of the Jacket. Plumes have been identified as emanating from the erosion pit.

6. Prepared by: (Planning Section Chief)

Date/Time

LCDR Mike Anderson

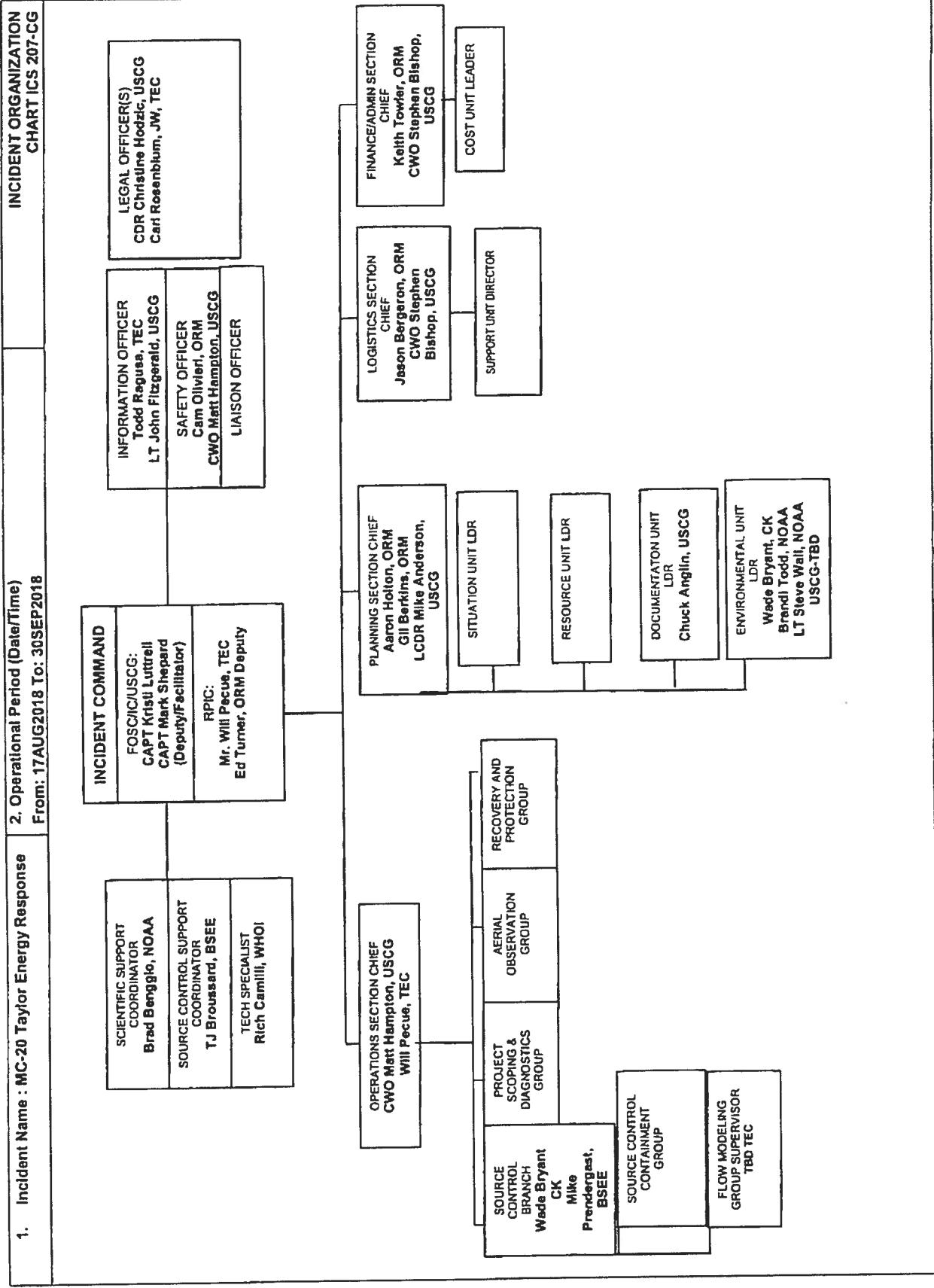
8/16/2018 1100

Command Direction

ICS 202A-CG (rev 03/2013)

|  |   |  |
|--|---|--|
| <b>1. Incident Name</b><br>MC-20 Taylor Energy Response  | <b>2. Operational Period (Date/Time)</b><br>From: 17AUG2018 To: 30SEP2018 | <b>INCIDENT OBJECTIVES</b><br>ICS 202-CG |
| <b>3. Objective(s)</b><br><p>A. Ensure the safety of response personnel and the public in the vicinity of the MC-20 site during all response activities. (M/O)</p> <p>B. Manage MC-20 response using a Unified Command structure and Incident Command System. (M)</p> <p>C. Secure the source of the ongoing sheen - elimination of the sheen within 12 months. (O)</p> <p>D. Monitor the site for recoverable oil. (O)</p> <p>E. Respond to recoverable oil. (O)</p> <p>F. Assess site conditions (ie sheen source location work group) including but not limited to sediment and release to recommend courses of action. (M)</p> <p>G. Keep the public and stakeholders informed of response activities. (M)</p> |   |  |
| <b>4. Operational Period Command Emphasis (Safety Message, Priorities, Key Decisions/Directions)</b><br>During this operational period, the command emphasis is:<br><ul style="list-style-type: none"> <li>- Observe the source</li> <li>- Follow-up or respond to dark oil</li> <li>- Assess and plan for dredging/haul away of contaminated sediment</li> </ul> <p>NOTE: In the development of the IAP the strategies identified in the ICS-234 were considered for further development in this operational period, and those that were not selected remain possible options if conditions change in the future. A copy of the ICS-234 is maintained with the DOCL.</p>  |   |  |
| <div style="display: flex; justify-content: space-between;"> <div> <b>Approved Site Safety Plan Located at:</b><br/> <b>5. Prepared by: (Planning Section Chief)</b><br/> LCDR Mike Anderson </div> <div> <b>Date/Time</b><br/> 08/16/2018 1100 </div> </div>  |   |  |

|  |   |  |
|--|---|--|
| <b>1. Incident Name</b><br>MC-20 Taylor Energy Response  | <b>2. Operational Period (Date/Time)</b><br>From: 17AUG18 To: 30SEP18 | <b>Critical Information Requirements</b><br>ICS 202B |
| <b>3. Critical Information Requirements:</b> <ul style="list-style-type: none"> <li>• Media coverage.</li> <li>• Media Inquiry/FOIA request concerning MC-20</li> <li>• Congressional Inquiry concerning MC-20</li> <li>• Any significant change in observed conditions at the site</li> <li>• Any convening of the overflight conference call procedures that results in a secondary overflight or dispatch of on water recovery assets</li> <li>• Severe Injury/Death to any member of UC (CG, NOAA, TEC, BSEE) working on the response</li> </ul> |   |  |
| <b>4. Prepared by: (Planning Section Chief)</b><br>LCDR Mike Anderson, PSC   |   | <b>Date/Time</b><br>8/16/2018 1100                   |



|  |  |  |  |                                      |  |
|--|--|--|--|--------------------------------------|--|
| <b>1. Incident Name</b><br>MC-20 Taylor Energy Response                                  |  | <b>2. Operational Period (Date/Time)</b><br>From: 17AUG18 To: 30SEP18  |  | <b>Assignment List</b><br>ICS 204-CG |  |
| <b>3. Branch</b>   |  | <b>4. Division/Group/Staging</b><br>Scoping and Additional Diagnostics |  |                                      |  |
| 5. Operations Personnel      Name      Affiliation      Contact # (s)                    |  |  |  |                                      |  |
| Operations Section Chief: <u>Will Pecue TEC (225) 328-3353 cell phone</u>                |  |  |  |                                      |  |
| Deputy Operations Section Chief: <u>DOSC Matt Hampton USCG (415) 302-8423 cell phone</u> |  |  |  |                                      |  |
| Branch Director: _____   |  |  |  |                                      |  |
| Deputy Branch Director: _____  |  |  |  |                                      |  |
| Division/Group Supervisor/STAM: _____  |  |  |  |                                      |  |

| Strike Team/Task Force/Resource Identifier | Leader | Contact Info. # | # Of Persons | Reporting Info/Notes/Remarks |                          |
|--|--------|-----------------|--------------|------------------------------|--------------------------|
| Future Vessel to be identified             |        |                 |              |                              | <input type="checkbox"/> |
|  |        |                 |              |                              | <input type="checkbox"/> |
|  |        |                 |              |                              | <input type="checkbox"/> |
|  |        |                 |              |                              | <input type="checkbox"/> |
|  |        |                 |              |                              | <input type="checkbox"/> |
|  |        |                 |              |                              | <input type="checkbox"/> |
|  |        |                 |              |                              | <input type="checkbox"/> |
|  |        |                 |              |                              | <input type="checkbox"/> |
|  |        |                 |              |                              | <input type="checkbox"/> |
|  |        |                 |              |                              | <input type="checkbox"/> |
|  |        |                 |              |                              | <input type="checkbox"/> |
|  |        |                 |              |                              | <input type="checkbox"/> |

**7. Work Assignments**  
 Conduct Scoping work in accordance with plans approved by the Unified Command.

**8. Special Instructions**

**9. Communications (radio and/or phone contact numbers needed for this assignment)**

| <u>Assignment</u> | <u>Channel Name</u> | <u>Frequency (Tx)</u> | <u>Phone</u> |
|-------------------|---------------------|-----------------------|--------------|
|                   |                     |                       |              |
|                   |                     |                       |              |
|                   |                     |                       |              |

  
**Emergency Communications**  
 Medical \_\_\_\_\_ Evacuation \_\_\_\_\_ Other \_\_\_\_\_

|   |                                  |  |                                  |  |                                  |
|---|----------------------------------|--|----------------------------------|--|----------------------------------|
| <b>10. Prepared by:</b><br>Chuck Anglin, USCG | <b>Date/Time</b><br>8/16/18 1115 | <b>11. Reviewed by (PSC):</b><br>Mike Anderson, LCDR | <b>Date/Time</b><br>8/16/18 1125 | <b>12. Reviewed by (OSC):</b><br>Matt Hampton, MSSR2 | <b>Date/Time</b><br>8/16/18 1135 |
|---|----------------------------------|--|----------------------------------|--|----------------------------------|

**ASSIGNMENT LIST (ICS 204-CG)**

ICS 204-CG (Rev 04/04)

ICS 204-CG (Rev 04/04)

|   |  |   |                                 |  |                  |                  |  |
|---|--|---|---------------------------------|--|------------------|------------------|--|
| <b>1. Incident Name</b><br>MC- 20 Taylor Energy Response      |  | <b>2. Operational Period (Date/Time)</b><br>From: 08/17/18 08:49 To: 09/30/18 08:49 |                                 | <b>MEDICAL PLAN</b><br>ICS 206-CG                        |                  |                  |  |
| <b>3. Medical Aid Stations</b>                                |  |   |                                 |  |                  |                  |  |
| <b>Name</b>   | <b>Location</b>  | <b>Contact #</b>  | <b>Paramedics On site (Y/N)</b> |  |                  |                  |  |
| Medic on Duty-Base New Orleans                                | -89.92843 30.01543   | Ph1: (504) 253-4671   | Y                               |  |                  |                  |  |
| Medic on Duty-NAS-JRB Belle Chase                             | -90.01786 29.82383   | Ph1: (504) 678-3660   | Y                               |  |                  |                  |  |
| West Bank Urgent Care   | 145 Wa1 Blvd<br>Gretna, LA<br>-90.03122 29.88611             | Ph1: (504) 393-2273   | Y                               |  |                  |                  |  |
| New Orleans Urgent Care                                       | 900 Magazine St<br>New Orleans, LA<br>-90.06956 29.94364     | Ph1: (504) 552-2433   | Y                               |  |                  |                  |  |
| <b>4. Transportation</b>                                      |  |   |                                 |  |                  |                  |  |
| <b>Ambulance Service</b>                                      | <b>Address</b>   | <b>Contact #</b>  | <b>Paramedics On site (Y/N)</b> |  |                  |                  |  |
| A-MED Ambulance Service Inc.                                  | 1800 Monroe St<br>Gretna, LA<br>-90.05058 29.92074           | Ph1: (504) 362-9490   | N                               |  |                  |                  |  |
| Priority Mobile Health  | 2001 25th st.<br>kenner, LA<br>-90.24184 30.00147            | Ph1: (504) 712-7911   | N                               |  |                  |                  |  |
| West Jefferson Medical Center Ambulance Service               | 5698 Belle Terre Road<br>marrero, LA<br>-90.11282 29.88004   | Ph1: (504) 340-8661   | N                               |  |                  |                  |  |
| East Jefferson Hospital Ambulance                             | 4200 Houma blvd<br>metairie, LA<br>-90.18158 30.0144         | Ph1: (504) 454-4444   | N                               |  |                  |                  |  |
| Oschner Flight Car  | 1514 Jefferson highway<br>Harvey, LA<br>-90.14472 29.96265   | Ph1: (504) 842-3198   | N                               |  |                  |                  |  |
| Care Ambulance Service - Harvey                               | 1901 westbank expressway<br>harvey, LA<br>-90.07091 29.90144 | Ph1: (504) 367-4231   | N                               |  |                  |                  |  |
| Acadian Ambulance Service – Slidell                           | 1181 Robert blvd<br>slidell, LA<br>-90.07091 29.90144        | Ph1: (985) 641-8077   | N                               |  |                  |                  |  |
| Acadian Ambulance Service – Covington                         |  | Ph1: (800) 259-1111   | N                               |  |                  |                  |  |
| <b>5. Hospitals</b>   |  |   |                                 |  |                  |                  |  |
| <b>Hospital Name</b>  | <b>Address</b>   | <b>Contact #</b>  | <b>Travel Time</b>              |  | <b>Burn Ctr?</b> | <b>Heli-Pad?</b> |  |
|   |  |   | <b>Air</b>                      | <b>Ground</b>  |                  |                  |  |
| Oschner Medical Center – West Bank                            | 2500 belle chasse hwy<br>gretna, LA<br>-90.07091 29.90144    | (504) 392-3131  | min                             | min  | N                | Y                |  |
| Lakeview Regional Medical Center                              | 95 judge tanner blvd<br>covington, LA<br>-90.08133 30.40985  | (985) 867-3800  | min                             | min  | N                | Y                |  |
| St. Tammany Hospital  | 1202 south tyler st<br>covington, LA<br>-90.11395 30.46887   | (985) 898-4000  | min                             | min  | N                | Y                |  |
| East Jefferson General Hospital                               | 4200 houma blvd<br>metairie, LA<br>-90.18158 30.0144         | (504) 454-4377/4000   | min                             | min  | N                | Y                |  |
| <b>7. Prepared by: (Medical Unit Leader)</b> <b>Date/Time</b> |  |   |                                 |  |                  |                  |  |
| Stephen Bishop  |  | 08/15/2018<br>13:20   |                                 | <b>8. Reviewed by: (Safety Officer)</b> <b>Date/Time</b> |                  |                  |  |
|   |  |   |                                 | 08/15/2018 13:20   |                  |                  |  |

MEDICAL PLAN

ICS 206-CG (Rev. 07/04)

| <b>1. Incident Name</b><br>MC- 20 Taylor Energy Response   |   | <b>2. Operational Period (Date/Time)</b><br>From: 08/17/18 08:49 To: 09/30/18 08:49 |             | <b>MEDICAL PLAN</b><br><b>ICS 206-CG</b> |           |                                      |  |
|--|---|---|-------------|--|-----------|--------------------------------------|--|
| <b>5. Hospitals</b>  |   |   |             |  |           |                                      |  |
| Hospital Name  | Address   | Contact #   | Travel Time |  | Burn Ctr? | Hell-Pad?                            |  |
|  |   |   | Air         | Ground                                   |           |                                      |  |
| DePaul-Tulane Medical Center   | 1415 Tulane ave<br>New Orleans, LA<br>-90.07638 29.95543      | (504) 988-5800  | min         | min                                      | N         | Y                                    |  |
| University Hospital -- New Orleans   | 2021 perdido st<br>New Orleans, LA<br>-90.0852 29.95627       | (504) 903-3000  | min         | min                                      | N         | Y                                    |  |
| LSU Medical Center   | 3700 st. charles ave<br>New Orleans, LA<br>-90.09491 29.92665 | (504) 412-1100  | min         | min                                      | N         | N                                    |  |
| Ochsner Baptist Medical Center   | 2700 napolean ave<br>New Orleans, LA<br>-90.10333 29.93731    | (504) 899-9311  | min         | min                                      | N         | N                                    |  |
| Slidell Memorial Hospital  | 1001 gause blvd<br>slidell, LA<br>-89.77033 30 2847           | (985) 643-2200  | min         | min                                      | N         | N                                    |  |
| Northshore Regional Medical Center   | 100 medical center dr<br>slidell, LA<br>-89.74407 30.28743    | (985) 649-7070  | min         | min                                      | N         | Y                                    |  |
| <b>6. Special Medical Emergency Procedures</b><br><br>Obtain necessary services. As soon as feasible, notify Safety Officer of casualty. |   |   |             |  |           |                                      |  |
|  |   |   |             |  |           |                                      |  |
| <b>7. Prepared by: (Medical Unit Leader)</b><br>Stephen Bishop   |   | <b>Date/Time</b><br>08/15/2018<br>13:20   |             | <b>8. Reviewed by: (Safety Officer)</b>  |           | <b>Date/Time</b><br>08/15/2018 13:20 |  |

MEDICAL PLAN

ICS 206-CG (Rev. 07/04)

|  |   | WORK ANALYSIS MATRIX<br>ICS 234-CG  |  |
|--|---|---|--|
| 1. Incident Name<br><b>MC-20 Taylor Energy Response</b>  |   | 2. Operational Period<br>From: 17Aug18 To:30Sep18   |  |
| 3. Operation's Objectives<br>DESIRED OUTCOME   | 4. Strategies<br>HOW  | 5. Tactics/Work Assignments<br>WHO, WHAT, WHERE, WHEN   |  |
| A.Ensure the safety of response personnel and the public in the vicinity of the MC-20 site during all response activities. (M/O) | A.1 Develop overall safety plan   | A.1.A Safety Officer<br>Develop Overall Plan with instructions how to handle specific operations  |  |
| B. Secure the source of the ongoing sheen - elimination of the sheen within 12 months  | <del>B.1 Manual by divers removal</del><br><del>B.2 Diver/ROV directed bottom vacuuming</del><br><del>B.3 Disturb the sediments eg Bottom nets, Rotech, Chains &amp; trawls</del><br><del>B.4 Dredging &amp; haul away</del><br><del>B.5 Capping eg natural or artificial</del><br><del>B.6 No additional action option</del><br><del>B.7 Containment Option</del><br><del>B.8 Intervention Option</del><br><del>B.8a Plugging intervention</del><br><del>B.8b Intervention to eliminate gas</del><br><del>B.8c Well completion to deplete source</del><br><del>B.9 Altering turbidity factors at the depression</del><br><del>B.10 Alter the weight on the sediment in the source location</del> | <del>B.3. Evaluate liability and indemnification of Taylor Energy for this type of operation as related to the type of transport of materials. CG Legal opinion indemnification is not feasible as this renders no longer an option from UC.</del><br>B.4. Assessments<br>- Identify locations for dredged spoils (ENVL) (eg volumetric calculations and location for disposal)<br>- Transportation of dredged spoils (ENVL)<br>- Dredge transfer of dredge spoils (ENVL)<br>- On water and shoreline recovery<br>- Shoreline cleanup assessment<br>- Dredging operations<br>- Mobilization<br>- Contracting and equipment integration<br>- Permitting<br>- Project modeling (eg volumetric calculations and location for removal)<br>- Project scoping & additional diagnostics (OPS)*<br>B.4.A.2. Planning<br>- Approved plan<br>- Plan review<br>- Plan development<br>B.4.A.3. Operations<br>- Demobilize complete<br>- Complete<br>- Conduct dredging operations<br>- Conduct oil spill recovery ops<br>- Mobilize resources<br>- Contract resources |  |
|  | C.1 Current overflight procedure<br>C.2 Revised overflight procedure  | Re-evaluate the distribution list assess the need for continued NRC reporting.  |  |

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|--|--|--|--|
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| C. Monitor the site for recoverable oil  | C.3 Non-traditional EG satellite   | Southern Seaplane will continue to conduct operations in accordance with UC SOP.                           |  |
| D. Respond to recoverable oil  | D.1 Continue current protocol  | D.1 Operations continue to execute protocol to follow-up or respond to dark oil in accordance with UC SOP. |  |
| E. Assess site conditions (ie sheen source location work group) including but not limited to sediment and release to recommend courses of action (M) | E.1 Environmental Unit Leader and Asst work together to develop recommendations to OPS section | E.1 Tactics and strategy for objective B will include activities to satisfy this objective.                |  |
| F. Keep the public and stakeholders informed of response activities. (M)   | F.1 Develop Public Affairs strategy  | F.1. Task assigned in the ICS-233  |  |
| 6. Prepared by: (Operations Section Chief)   |  | 7. Date/Time:  |  |

## WORK ANALYSIS MATRIX FORM INSTRUCTIONS (ICS FORM 234-CG) Rev. 8/05

**Purpose.** The Work Analysis Matrix is designed to help select the best strategies and tactics to achieve the operational objectives. This optional form assists staff in carrying out incident objectives by outlining the who, what, where, when, and how of the response. The tactics from this form carry forward to the "Work Assignment" on the ICS-215. Another purpose of the ICS-234 is that it presents alternative (or what-if) strategies and tactics to respond to bad weather, sudden changes in operational conditions, etc. This form is simply a formalized version of how most OSCs tend to think in order to turn objectives into tactical field work.

**Preparation.** The Work Analysis Matrix, if used, is usually completed by the Operations Section Chief and Planning Section Chief prior to the Tactics Meeting.

**Distribution.** All completed original forms must be submitted to the Documentation Unit.

| Item # | Item Title               | Instructions  |
|--------|--------------------------|---|
| 1.     | Incident Name            | Enter the name of the incident  |
| 2.     | Operational Period       | Enter the time interval for which the form applies.<br>Record the start and end date and time.                                    |
| 3.     | Operational Objectives   | Enter the relevant Operational Objectives from the ICS 202, with numbers  |
| 4.     | Strategies               | Enter all strategies that could be used to meet the objective ("how")   |
| 5.     | Tactics/Work Assignments | Enter details, including as much as possible, who, what, where, and when, of work assignments to carry out Operational Strategies |
| 6.     | Prepared By              | Enter the name and position of the person preparing the form  |
| 7.     | Date/Time                | Enter the date and time (24-hour format) the form was prepared  |